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August 18, 2021

VIA ECF

Hon. Judge Brian M. Cogan
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Allstate Insurance Company et al v. Epione Medical, P.C. et al, 1:21-cv-03970-BMC*
Joint Letter Requesting Extension of Time to Answer on Consent

Your Honor:

This Firm represents Defendants Dr. Aleksandr Mostovoy and his medical practice, APAK Chiropractic, P.C. (collectively “Defendants”) in the above-referenced action. We write to request an extension of time for Defendants to respond to the Complaint in this matter [DE 1].

This is Defendants’ first request for an extension of time. This request is made with the consent of Plaintiffs, who are copied on this letter motion. The current deadline for Defendants to respond is August 20, 2021. Defendants request an extension to respond through September 10, 2021. Defendants’ request is needed because the undersigned has just been recently retained and needs time to review the pleadings in this case and Defendants’ case files to properly respond to the allegations in the Complaint. For the foregoing reasons, Defendants respectfully request that this Court grants its request in its entirety.

We thank the Court for its time and attention.

Respectfully submitted,

/s/ Oleg A. Mestechkin
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Cc.:

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2021, I served the foregoing document via electronic filing with the Clerk of the Court using the CM/ECF filing system.

/s/ Wing K. Chiu
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